KEMP JONES, LLP 3800 Howard Hughes Parkway Seventeenth Floor Las Vegas, Nevada 89169 (702) 385-6000 • Fax (702) 385-6001 kic@kempiones.com	1 2 3 4 5	KEMP JONES Michael J. Gayan (#11135) Wells Fargo Tower, 17 th Floor 3800 Howard Hughes Parkway Las Vegas, NV 89169 T: 702.385.6000 F: 702.385.6001 m.gayan@kempjones.com	
	6 7 8 9 10 11 12 13	DLA PIPER LLP (US) David S. Sager (Admitted Pro Hac Vice) 51 John F. Kennedy Parkway, Suite 120 Short Hills, New Jersey 07078 T: 973.520.2550 F: 973.520.2551 david.sager@us.dlapiper.com Kyle T. Orne (Admitted Pro Hac Vice) 2525 East Camelback Road, Suite 1000 Phoenix, AZ 85016 T: 480.606.5100 F: 480.606.5101 dlaphx@us.dlapiper.com Attorneys for Defendants Venetian Casino Resort, LLC and Las Vegas Sands LLC	
	15	UNITED STATES DISTRICT COURT	
	16	DISTRICT OF NEVADA	
	17	A.H., an Individual,	Case No.: 2:24-cv-01041-GMN-NJK
	17 18	A.H., an Individual, Plaintiff,	STIPULATION AND PROPOSED
			STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC
	18	Plaintiff,	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR
	18 19	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-
	18 19 20	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS VEGAS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-1)
	18 19 20 21	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS VEGAS HOLDINGS, LLC, a Nevada	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-
	18 19 20 21 22	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS VEGAS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN AMERICA GROUP, LLC, a Nevada Limited Liability Company; WYNN RESORTS FINANCE, LLC, a Nevada Limited Liability	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-1)
	18 19 20 21 22 23	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS VEGAS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN AMERICA GROUP, LLC, a Nevada Limited Liability Company; WYNN RESORTS FINANCE, LLC, a Nevada Limited Liability Company; WYNN RESORTS HOLDINGS, LLC, a Nevada Limited Liability Company;	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-1)
	18 19 20 21 22 23 24	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS VEGAS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN AMERICA GROUP, LLC, a Nevada Limited Liability Company; WYNN RESORTS FINANCE, LLC, a Nevada Limited Liability Company; WYNN RESORTS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN RESORTS, LIMITED, a Nevada Corporation; ARIA RESORT & CASINO,	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-1)
	18 19 20 21 22 23 24 25	Plaintiff, v. WYNN LAS VEGAS, LLC, a Nevada Limited Liability Company; WYNN LAS VEGAS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN AMERICA GROUP, LLC, a Nevada Limited Liability Company; WYNN RESORTS FINANCE, LLC, a Nevada Limited Liability Company; WYNN RESORTS HOLDINGS, LLC, a Nevada Limited Liability Company; WYNN RESORTS, LIMITED, a Nevada	STIPULATION AND PROPOSED ORDER TO EXTEND DEADLINE FOR VENETIAN CASINO RESORT, LLC AND LAS VEGAS SANDS, LLC TO RESPOND TO PLAINTIFF'S AMENDED COMPLAINT (ECF NO. 1-1)

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Liability Company; MGM RESORTS INTERNATIONAL, a Delaware Corporation; VENETIAN CASINO RESORT, LLC, d/b/a THE VENETIAN LAS VEGAS, a Nevada Limited Liability Company; LAS VEGAS SANDS, LLC d/b/a THE VENETIAN LAS VEGAS, a Nevada Limited Liability Company; NEW YORK-NEW YORK HOTEL & CASINO, LLC d/b/a NEW YORK-NEW YORK HOTEL AND CASINO, a Nevada Limited Liability Company; CITYCENTER LAND, LLC, a Nevada Limited Liability Company; ACE A PROPCO LLC, a Delaware Limited Liability Company; DOES I-X; ROE BUSINESS ENTITIES XI-XX, inclusive,

Defendants.

Plaintiff A. H. ("Plaintiff") and Defendants VENETIAN CASINO RESORT, LLC and LAS VEGAS SANDS, LLC (together, "Venetian Defendants"), by and through their respective counsel of record (collectively, the "Parties"), hereby agree to extend the Venetian Defendants' deadline to respond to Plaintiff's Amended Complaint.

I.

STIPULATION

- 1. WHEREAS, on May 8, 2024, Plaintiff filed the Amended Complaint in the Eighth Judicial District Court, Clark County, Nevada. ECF No. 1-1 at 5–110.
- 2. WHEREAS, on May 16, 2024, Plaintiff served the Amended Complaint on the Venetian Defendants. ECF No. 1-2.
- 3. WHEREAS, on June 3, 2024, the Venetian Defendants removed this action to this Court. ECF No. 1.
- 4. WHEREAS, pursuant to the Court's prior order entered on June 13, 2024 (ECF No. 10), the Venetian Defendants' current deadline to respond to the Amended Complaint is July 8, 2024. Since then, lead counsel for the Venetian Defendants have been handling an

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kic@kempiones.com

arbitration that has taken a substantial amount of time that they had planned to use to complete the necessary work to meet the July 8 deadline.

- 5. WHEREAS, Plaintiffs and the Venetian Defendants continue to meet and confer regarding the proper and necessary defendant(s) to be named for Plaintiff's claims related to the Venetian Las Vegas resort hotel and casino. ECF No. 1-1 at 77–85. The Parties desire to complete these discussions and, if successful, submit a Joint Motion to dismiss the Venetian Defendants, add a new Defendant, and amend the caption before the Venetian Defendants and/or their successor responds to the Amended Complaint. This will allow for orderly and streamlined motion practice limited to the proper parties in interest.
- 6. WHEREAS, the Parties agree that the Venetian Defendants' deadline to respond to the Amended Complaint shall be extended from the current deadline until **July 15, 2024**.

IT IS SO STIPULATED.

DATED this 5th day of July, 2024.

DATED this 5th day of July, 2024.

KEMP JONES, LLP

/s/ Michael Gayan Michael J. Gayan, Esq. (#11135) Wells Fargo Tower, 17th Floor 3800 Howard Hughes Parkway Las Vegas, NV 89169 m.gayan@kempjones.com

DLA PIPER LLP (US)

David S. Sager (Admitted Pro Hac Vice) 51 John F. Kennedy Parkway, Suite 120 Short Hills, New Jersey 07078 david.sager@us.dlapiper.com

Kyle T. Orne (Admitted Pro Hac Vice) 2525 East Camelback Road, Suite 1000 Phoenix, AZ 85016 dlaphx@us.dlapiper.com

Attorneys for Defendants Venetian Casino Resort, LLC and Las Vegas Sands LLC

CLAGGETT & SYKES LAW FIRM

/s/ Brian Blankenship
Sean K. Claggett
Brian Blankenship
Scott E. Lundy
4101 Meadows Lane, Suite 100
Las Vegas, NV 89107
sclaggett@claggettlaw.com
brian@claggettlaw.com
scott@claggettlaw.com

LEVIN PAPANTONIO RAFFERTY

Kimberly L. Adams Matthew D. Schultz 316 South Baylen Street Pensacola, FL 32502 kadams@levinlaw.com mschultz@levinlaw.com

Attorneys for Plaintiff

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II.

ORDER

Based on the foregoing Stipulation by Plaintiff and the Venetian Defendants, and for other good cause appearing,

IT IS HEREBY ORDERED that the deadline for Defendants VENETIAN CASINO RESORT, LLC and LAS VEGAS SANDS, LLC to respond to Plaintiff's Amended Complaint is hereby extended until **July 15, 2024**.

IT IS SO ORDERED.

Dated: July 8, 2024

Nancy J. Koppe

United States Magistrate Judge